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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

COLLINS BEKOE,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

VINCENT MARINO, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about June 1, 2012, within the Eastern District of New York and elsewhere, defendant COLLINS BEKOE did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about June 1, 2012, the defendant COLLINS BEKOE arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Emirates Airlines flight #201 from Dubai, United Arab Emirates.

2. The defendant was selected for a Customs and Border Protection ("CBP") examination. During the examination, the defendant presented two suitcases for inspection, one black "Eminent" suitcase and one brown "London fog" suitcase. The defendant admitted that both suitcases, including their contents, were his. During the following routine inspection of his luggage, the CBP officer noticed that the black "Eminent" suitcase felt unusually heavy and thick. The defendant was escorted to a private search room, where a CBP officer probed the black "Eminent" suitcase, revealing a brown powdery substance, which field-tested positive for the presence of heroin. The defendant was then placed under arrest.

3. The total approximate gross weight of the heroin seized from the defendant COLLINS BEKOE's luggage is 2,464 grams.

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that
defendant COLLINS BEKOE be dealt with according to law.

A handwritten signature in black ink, appearing to read 'Vincent Marino', is written over a horizontal line.

VINCENT MARINO
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
2nd day of June, 2012

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